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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE)
ANTITRUST LITIGATION)
) No. 11-CV-2509-LHK
THIS DOCUMENT RELATES TO:)
ALL ACTIONS.)

VIDEO DEPOSITION OF CHRIS GALY
ATTORNEYS' EYES ONLY
March 20, 2013

Reported by: Anne Torreano, CSR No. 10520

1 this: When you were reviewing your declaration earlier
2 in answer to my questions, were you able to identify or
3 did you see any sentences in it that you believe that
4 you initially wrote in the first instance?

03:54:31 5 A. I don't remember.

6 Q. Okay. My next question to you is kind of like
7 a same follow-up kind of question, which is, in
8 reviewing documents with your attorney in preparation
9 for this deposition, did any of the documents that you
03:54:51 10 looked at help you remember something that you
11 testified about today?

12 A. Say that one more time, please.

13 Q. It's terrible, isn't it?

14 A. Yeah.

03:55:04 15 Q. Did any of the documents that you looked at
16 yesterday with Mr. Kiernan help you remember something
17 that you testified about today?

18 A. Yes.

19 Q. Okay. What documents helped you remember
03:55:13 20 something that you testified about?

21 I don't want to go through that pile. Is it
22 all stuff that you saw here again today?

23 A. Yes.

24 Q. Okay. Is there anything that you looked at
03:55:30 25 with him that helped you remember something that you

1 testified about that I didn't show you today?

2 A. Not -- no.

3 MR. GLACKIN: Okay. That's it. No further
4 questions.

03:55:45 5 MR. KIERNAN: I think I just have a couple.
6 We don't need to switch. Some people make me.

7 MR. GLACKIN: I don't care where you sit.

8 MR. KIERNAN: I know. Exactly. But you can
9 keep looking at the --

03:55:56 10 THE WITNESS: Okay.

11 MR. KIERNAN: -- camera, as bizarre as that
12 may be.

13 EXAMINATION

14 BY MR. KIERNAN:

03:55:59 15 Q. [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

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Q. Okay. And then do you recall we had some

13

discussion today about your views of internal equity?

14

A. Yes.

03:58:24 15

Q. Do you recall that? Okay.

16

█

█

█

03:58:39 20

Do you recall that?

21

A. I do.

22

MR. GLACKIN: Object to the form.

23

MR. KIERNAN: Okay. You object to the form of

24

whether he recalls saying that?

03:58:45 25

MR. GLACKIN: It's leading. You should just

REPORTER'S CERTIFICATE

I, Anne Torreano, Certified Shorthand Reporter
licensed in the State of California, License No. 10520,
hereby certify that the deponent was by me first duly
sworn, and the foregoing testimony was reported by me
and was thereafter transcribed with computer-aided
transcription; that the foregoing is a full, complete,
and true record of said proceedings.

I further certify that I am not of counsel or
attorney for either or any of the parties in the
foregoing proceeding and caption named or in any way
interested in the outcome of the cause in said caption.

The dismantling, unsealing, or unbinding of
the original transcript will render the reporter's
certificates null and void.

In witness whereof, I have subscribed my name
this 1st day of April, 2013.

☒ Reading and Signing was requested.

☐ Reading and Signing was waived.

☐ Reading and Signing was not requested.

ANNE M. TORREANO, CSR No. 10520